



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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217/785-9407

April 27, 2000

Mr. William E. Muno  
United States Environmental Protection Agency  
Superfund Division  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

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SUPERFUND DIVISION  
OFFICE OF THE DIRECTOR

Reference: Sauget Area Superfund Sites, St. Clair County, Illinois

Dear Mr. ~~Muno~~ **Bill**:

It is the Illinois Environmental Protection Agency's (Illinois EPA) understanding that the United States Environmental Protection Agency (USEPA) will soon issue a Unilateral Administrative Order (UAO) to Monsanto Company and Solutia, Inc. for the removal of sediments in multiple segments of Dead Creek and the construction of a landfill to contain those sediments at the Sauget Area 1 Superfund Site. These activities are identified by USEPA in the draft order as a time critical removal action. Generally, Illinois EPA considers the construction and long term operation and maintenance of a landfill to be a part of a permanent solution. Illinois EPA is concerned that a process normally subject to intensive and often lengthy review is being conducted in an abnormally short time frame. As such, we would like USEPA's assurance that any landfill constructed will be subject to adequate oversight and review for regulatory compliance and technical adequacy.

We have identified the following specific issues with the draft UAO and the proposed landfill.

On-Site Disposal. The draft order requires excavation of contaminated sediments from Dead Creek, construction of a RCRA/TSCA landfill adjacent to Dead Creek, and disposal of the sediments in the landfill. Rather than construct a new landfill as a hazardous waste management unit, the contaminated sediments could be shipped to the same disposal facility that is accepting contaminated drums and soils from Site Q. At a minimum, the cost of Solutia's on-site disposal alternative should be reevaluated and compared with USEPA's cost for off-site disposal of the Site Q contamination.

Scheduling. The draft order (3-31-00 revision) states that removal of the sediments from Dead Creek and Site M shall begin no later than 6 months from the date the order is signed. Therefore, the following activities must be completed within that time in order to comply with the order:

1. Monsanto/Solutia needs to perform a subsurface investigation to evaluate the engineering characteristics, hydrogeology, and potential contamination of the soils and groundwater under the proposed location of the containment cell.
2. USEPA (or their contractor) needs to review the Containment Cell Design Report. Of particular concern are the design aspects and construction/operational procedures which will be employed to protect the relatively thin and fragile liner system.
3. Monsanto/Solutia needs to hire a contractor and construct the cell.

Illinois EPA believes that 6 months is a much too short time to properly perform all of these important activities. We are concerned that rushing the review of the landfill design and the construction process could result in a landfill, which does not meet the regulations and might experience structural problems in the future.

Strict Compliance with RCRA. While the draft order has been revised to include several RCRA requirements, the following requirements need to be included as well:

1. The order needs to specifically require the Containment Cell to be constructed in accordance with the requirements for RCRA Subtitle C hazardous waste landfills at 35 IAC 724.401. The order needs to cite these regulations.
2. The landfill must be constructed following the Construction Quality Assurance (CQA) Program requirements at 35 IAC 724.119.
3. Monsanto/Solutia must provide information that **demonstrates** (emphasis added) that the wastes placed in the cell are compatible with all of the materials in the liner system (HDPE liners, Bentomat, geosynthetics, gravel, etc.). Currently the draft order requires only the submittal of information on the compatibility of the wastes and liner materials.
4. The order needs to include a description of the design of the cover system (the individual layers, slope, etc.) for the containment cell which demonstrates that the cover system will meet the requirements at 35 IAC 724.410. Cross section details of the cover system and bottom liner have been provided to, and reviewed by, USEPA and Illinois EPA. However, these drawings have not been included in the draft order.
5. The draft order does not include any discussion of the Land Disposal Restrictions (LDRs) at 35 IAC 728. The LDRs are part of the RCRA requirements for landfills and need to be addressed in some way in the order.

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Regarding the Sauget Area Sites Superfund Sites  
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We have also identified the following issues with the draft order's proposed removal of sediments.

Removal of Dead Creek Contaminated Sediments. The draft order requires removal of approximately 18,500 cubic yards of non-native material from Dead Creek Segment B--roughly equivalent to removal of three feet of material from the creek and one foot of material from the creek flood plain. We agree that excavating three feet of material from Segment B should remove a significant amount of contamination, but how much of the existing contamination will be removed in this three foot excavation? Solutia should provide a justification with analytical data to support the requirement in the order for the removal of three feet of material.

Dead Creek Liner. After excavation of non-native material from Dead Creek, the draft order requires that a membrane liner be placed in Segment B. What is the intent of this requirement and what functions will be provided? It must be noted that the unlined hazardous waste landfill at Site G is adjacent to the west bank of Segment B and will likely act as a source of groundwater contamination under and around Segment B.

Finally, due to our historical involvement and level of interest in the Sauget Area 1 and 2 Sites, Illinois EPA requests funding from USEPA to support construction and field oversight at this site in order to assure compliance with ARARs and protect human health and the environment. This funding is necessary to continue the level of support the Illinois EPA has been providing USEPA on this extremely important project.

If you should have any questions, comments, or wish to discuss these matters, please contact me at 217/785-9407.

Respectfully,

Bill

~~William C.~~ Child, Chief  
Bureau of Land